REMARKS

The application contains claims 1-27 and 58-65. Claims 58-65 are new. In view of the foregoing amendments and following remarks, Applicants respectfully request allowance of the application.

At the outset, Applicants thank Examiner To for the courtesy of the May 6th interview with the undersigned. The interview provided an opportunity to discuss alternate claiming strategies to define the pending claims over the cited art. Although no formal agreement was reached, the Examiner suggested that the foregoing amendments were likely to be received favorably. The following arguments were made during that interview.

CLAIMS 1-27 DEFINE OVER MIZOGUCHI

Claims 1-27 stand rejected over Mizoguchi. Applicants request reconsideration in view of the instant amendments.

Consider claim 1, which recites in part:

receiving archiving input data identifying: a digital media item to be archived for the group, the user's selection of zero or more group event types from a predetermined plurality of group event types specific to the group, the user's selection of zero or more persons in the group, and the user's selection of a time period;

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receiving retrieval input data representing the user's selection of a default or zero or more group event types from the predetermined plurality of group event types for the group, the user's selection of a default or zero or more persons in the group, and the user's selection of a time period; and

Mizoguchi does not teach or suggest this subject matter. First, Mizoguchi does not permit selection of event types that are *specific to the group* to which a user belongs. Mizoguchi discloses two modes of operation. In FIG. 7B, Mizoguchi's system copies *free text* event information from a scheduler application based on a comparison of time indicators. There are no predetermined event types, much less predetermined types that are specific to a group to which the operator belongs. See, Col. 8:29-9:26. As an alternative, Mizoguchi's system determines whether a photographer is a member of a group and, if so, it stores a group name with the photographic image data. Col. 11:22-34. This alternative appears to be a substitute

for the method disclosed in FIG. 7B. Mizoguchi nowhere suggests that event information or personal information can be stored with a photograph in this alternative. Claim 1, therefore, defines over this art.

Second, claim 1 defines archiving input data and retrieving input data each of which represents inter alia a user's selection of zero or more group event types and zero or more persons in a group. As explained during the interview, Mizoguchi does not require such steps because Mizoguchi does not require a positive selection of event types (whether they be specific event types or "any" event types) and a positive selection of people as recited. This is a second basis on which claim 1 defines over Mizoguchi. Claim 1 and dependent claims 2-13 are allowable over Mizoguchi.

Claim 14 has been amended to recite:

> user interface means for generating archiving input data identifying:
>> a group to which the user belongs,
>> a digital media item to be archived for the group,
>> a user selection of zero or more group event types from a predetermined plurality of group event types specific to the group,
>> a user selection of zero or more persons in the group, and
>> a user selection of a time period;
> wherein said user interface means further is for generating retrieval input data identifying:
>> a group to which a retrieving user belongs,
>> a retrieving user's selection of a default or zero or more group event types from the predetermined plurality of group event types for the group,
>> a retrieving user's selection of a default or zero or more persons in the group,
>> a retrieving user's selection of a time period; and

Again, Mizoguchi does not teach or suggest this subject matter. As explained, Mizoguchi does not teach or suggest a selection of group event types which are specific to the group. Moreover, Mizoguchi does not require a user selection of zero or more group event types (an affirmative entry of data) or zero or more persons from a group, either during entry of archiving input data or during generation of retrieval input data. Claim 14, therefore, is allowable over the cited art.

Claims 15 and 17 also have been amended to recite that a selected group event type is specific to the group and to require positive selections of zero or more group event types and

zero or more persons from a group. As noted, Mizoguchi does not teach or suggest such subject matter. Accordingly, claims 15, 17 and dependent claims 18-27 define over Mizoguchi and can be allowed.

THE NEW CLAIMS DEFINE OVER THE ART

Claims 58-65 are new. These claims also are allowable over the cited art. For example, claim 58 recites:

> identifying candidate identification values based upon the group with whom the operator is authenticated,
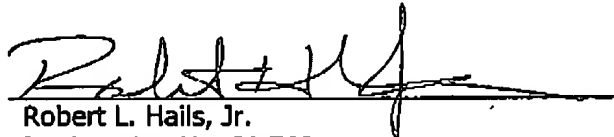>
> querying the operator for selection of identification data to be associated with a digital media item, the query identifying the candidate identification values and including valid selections of an event type and persons from the group and time,

Claim 62 recites similar subject matter. Mizoguchi does not disclose identification of candidate identification values based upon membership in any group, nor does he disclose presenting the candidate identification values to an operator as part of a query. Accordingly, claims 58-65 define over the closest known art.

In view of the foregoing, Applicants respectfully request allowance of the application.

Respectfully submitted,

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